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Office:

UILC: 62.00-00

From:

Sent: Wednesday, September 16, 2009 8:55:30 AM

To: Cc:

Subject: RE: Expense Allowance

This is impermissible wage recharacterization and violates the business connection requirement of an accountable plan. Although in a somewhat different context, we have issued formal CCA on this issue involving a tool plan. can get you a copy of that and we can help with this specifically if you'd like.